

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LEVI HUEBNER on behalf of himself and all
others similarly situated,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT, INC.,
and MIDLAND FUNDING LLC,

Defendants.

Civil Action No.: CV 14-6046 (BMC)

**ATTORNEY DECLARATION
IN SUPPORT OF REPLY TO OPPOSITION TO
MOTION TO WITHDRAW**

I, Gustavo F. Bruckner, of Pomerantz LLP, state the following as true under the laws governing prohibiting perjury:

1. I am an attorney admitted to the practice of law in the State of New York and am appearing in the above-captioned action (“Action”) in the U.S. District Court for the Eastern District of New York.

2. I make the following declaration voluntarily upon the knowledge of the facts and events known to me.

3. I make the following declaration in support of Pomerantz’s Reply to Plaintiff’s Opposition to the Motion to Withdraw as counsel (“Motion to Withdraw”) filed concurrently herewith.

4. The extent of Pomerantz’s representation of Plaintiff related only to two matters: the Motion to Certify Class and defense of the Motion for Summary Judgment.

5. I was never told by Plaintiff, Poltorak PC, or its personnel that Poltorak PC and its of counsel attorneys relinquished responsibility over this case to Pomerantz. Poltorak's personnel actively assisted Pomerantz in the preparation of the Motion to Certify Class and in the defense of the Motion for Summary Judgment. Aside from generating relevant documents, Poltorak PC personnel have conducted legal research and offered plausible legal theories in support of the two pleadings filed by Pomerantz. Additionally, Poltorak PC personnel saw the drafts of the two pleadings, and were signatories to the two pleadings.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 27, 2016

Respectfully submitted,

POMERANTZ LLP

By: /s/ Gustavo F. Bruckner

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Attorney for Plaintiff

VERIFICATION

I, Gustavo F. Bruckner, verify pursuant to Rule 11(b) of the Federal Rules of Civil Procedure, that I conducted a reasonable inquiry to the facts and laws stated in the foregoing affidavit, and certify in good faith that under the circumstances:

1. The factual allegations stated in the foregoing related to myself and Pomerantz LLP are true to the best of my knowledge.

Dated: July 27, 2016

Respectfully submitted,

POMERANTZ LLP

By: /s/ Gustavo F. Bruckner

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